

From: [Steven Selbe](#)
To: [Curt Hesse](#); [Ruben Castro](#)
Cc: [Melissa Moore](#)
Subject: RE: No. 3:2022-cv-00112, Lowry v. LaMarque
Date: Friday, November 22, 2024 8:38:55 AM

CAUTION - EXTERNAL:

Mr. Castro,

I contacted my clients and I had not heard from all of them through yesterday afternoon. They are opposed to this request. They timely filed their motions and the response deadline is fairly generous under the Federal Rules. Plaintiff now seeks an extension that exceeds the original response deadline period. While sympathetic to Mr. Hesse's and Ms. Moore's situations, the situation is made more difficult by the Plaintiff's daily social media posts about his likely success in the current lawsuit. As a result, my clients have advised me that they are opposed to a 30 day extension.

Best regards,



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From: Curt Hesse <Curt@mooreandassociates.net>
Sent: Friday, November 22, 2024 8:05 AM
To: ruben_castro@txs.uscourts.gov
Cc: Steven Selbe <sselbe@grsm.com>; Melissa Moore <Melissa@mooreandassociates.net>
Subject: No. 3:2022-cv-00112, Lowry v. LaMarque

Mr. Castro,

The parties have consented to Judge Edison in this case, and I have in my notes that he preferred that we email you when requesting an extension as opposed to filing a formal

motion. To that end, I am requesting an extension of 30 days to respond to the defendants' motions for summary judgment (which are docket entries 44 and 45). Both I and Ms. Moore recently experienced deaths in our respective families. That, together with the holidays, has put us somewhat behind. I do not know if the request is opposed. I reached out to Mr. Selbe (who represents the defendants and is copied on this email) yesterday, but I have not heard back. I may have missed the response.

If I misunderstood Judge Edison's instruction, please let me know, and I will gladly file a formal motion.

Best,

Curt Hesse
Moore & Associates
713-222-6775

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